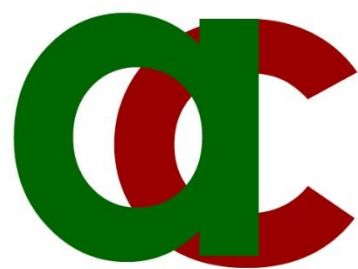


2017

# Anti-Fraud & Corruption Policy



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3/8/2017



# Anti-Fraud & Corruption Policy

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*This document explains Angling Cymru's (AC) Anti-Fraud and Corruption Policy and the steps that must be taken where fraud is suspected or discovered. All staff and directors should be aware of this policy. Any person who becomes aware of any fraud, corruption or other illegal act and does not follow this policy could be subject to disciplinary action.*

## 1. INTRODUCTION

1.1 One of the basic principles of public sector organisations is the proper use of public funds. It is therefore important that all those who work in the public sector or belong to organizations utilizing public funds are aware of the risk of and means of enforcing the rules against fraud and other illegal acts involving dishonesty, inappropriate Internet use, or damage to property. For simplicity all such offences are hereafter referred to as "fraud", except where the content indicates otherwise. This document sets out AC policy for detected or suspected fraud, and incorporates best practice within the field regarding counter-fraud measures and takes account of the latest legislation.

## 1.2 DEFINITIONS

**Fraud** is theft by deception. It is deliberate intent to permanently deprive a person or organisation of money or goods through the falsification of any records or documents.

**Corruption** where someone is influenced by bribery, payment or benefit in kind to unreasonably use their position to give some advantage to another.

**Other Irregularity** – examples:-

Fraudulently misappropriating Federation's time/pay, for example whilst viewing offensive Internet sites or any other material that might breach policy.

Inappropriate use of the Federation's equipment;

**Theft** includes any misappropriation, stealing, malicious damage, and actual or attempted break-in.

1.3 this Anti-Fraud and Corruption policy should be read in conjunction with the following AC policies that also consider how to control and react to fraud and other illegal or dishonest acts:-

- 1.3.1 Data Protection Policy
- 1.3.2 Disciplinary Policy and Procedure.
- 1.3.3. Whistleblowing Policy
- 1.3.4 Conflicts of Interest Policy
- 1.3.5 Financial Procedures Manual



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All the above policies are available from AC Company Secretary.

1.4 AC already has procedures in place that reduces the likelihood of fraud occurring, these include the AC Finance Procedures Manual. In addition AC tries to ensure that a risk (and fraud) awareness culture exists in the organisation.

1.5 AC Board holds primary responsibility for these measures, although it is recognized that all officers and staff have a part to play in ensuring their efficiency. It is expected that AC Board Directors, officers and staff at all levels will lead by example in acting with the utmost integrity and ensuring adherence to all relevant regulations, policies and procedures. A culture of openness, honesty and probity is strongly encouraged through the promotion of AC values.

1.6 the Company Treasurer is required to report and keep the AC Board informed of any fraud cases which come to light.

## **2. Angling Cymru POLICY**

2.1 AC is absolutely committed to maintaining an honest, open and well-intentioned atmosphere within the organisation. It is therefore also committed to the elimination of any fraud and to the rigorous investigation of any such cases.

2.2 AC expects anyone having reasonable suspicions of fraud to report them. It recognizes that whilst cases of theft are usually obvious, there may only be a suspicion of fraud and thus staff must report any concerns to their manager or other suitable persons who can then ensure that AC procedures are followed.

2.3 It is also AC policy, which will be rigorously enforced, that no employee will suffer in any way as a result of reporting reasonably held suspicions. All staff can therefore be confident that they will not suffer in any way as a result of reporting reasonably held suspicions of fraud. For these purposes "reasonably held suspicions" shall mean any suspicions other than those which are raised maliciously and found to be groundless.

## **3. ROLES AND RESPONSIBILITIES**

3.1 This section states the roles and responsibilities of AC staff and/or officers in reporting fraud or other irregularities.

### **STAFF**

3.1 Staff are expected to act in accordance with AC standards of conduct and to follow guidance on the receipt of gifts or hospitality, available from line managers or personnel. Staff also have a duty to protect the assets of AC, including information and goodwill as well as property.

3.2 The AC rules and policies place an obligation on all staff to act in accordance with best practice. AC officers and Board are subject to the same high standards of accountability, and are required to declare and register any interests that might potentially conflict with those of AC (See Conflicts of Interest)

### **MANAGERS**

3.3 Managers must be vigilant and ensure that procedures to guard against fraud are followed. They must try to establish an anti-fraud culture within their team and ensure that information on procedures is made available to all their staff. They should identify the risk of fraud within their section and consider the adequacy or previous controls.



3.4 Managers should be alert to the possibility that unusual events or transactions could be symptoms of fraud. Where they have any doubt they must seek advice from their immediate manager or finance officer.

3.5 All cases of theft whether of AC or visitor, property must be reported to an AC Director.

3.6 Where staff have access to the Internet during work time, where possible, managers need to ensure that any use is appropriate to their job, and any private use specifically agreed beforehand.

3.7 Any instance of deliberate viewing of offensive material (e.g. pornography, or hate material) must be reported immediately.

## **EXTERNAL AUDIT**

3.8 External Audit, through SCW, may evaluate the systems used to control AC activities. Where any system weaknesses are identified they will undertake additional testing to determine if a fraud has taken place.

3.9 External Audit can also provide specialist advice on counter-fraud matters, both investigating and suspicious or actual incidents and, or providing publicity either running fraud workshops or providing presentations.

## **HUMAN RESOURCES**

3.10 The Treasurer will, with the Board and relevant managers where an employee is suspected of being involved in fraud or corruption, lead any investigation. Board Directors are responsible for ensuring the appropriate use of AC's Disciplinary Procedures, and will advise those involved in the disciplinary process in matters of employment law and in other procedural matters.

3.11 Board Directors must take steps at recruitment to establish, as far as possible, the previous record of potential staff in terms of their propriety and integrity. In this regard, temporary and 'fixed term' contract staff are treated in the same manner as permanent staff.

## **INFORMATION AND COMMUNICATIONS TECHNOLOGY**

3.12 Board Directors must be informed in all cases where there is a suspicion that IT is being used for fraudulent purposes. This includes inappropriate Internet or e-mail.

3.13 Any decision on what may be regarded as inappropriate will be referred to the Board.

## **4. REPORTING FRAUD CORRUPTION OR OTHER ILLEGAL ACTS**

4.1 This section outlines the **action to be taken** where fraud, corruption or other illegal acts involving dishonesty, inappropriate Internet use, or damage to property are discovered or suspected. For completeness it also deals with the action to be taken where theft is discovered or suspected.

4.2 The attached Annex is designed to be a reminder of the key "what to do" steps to be taken where fraud or other illegal acts are discovered or suspected. Managers are encouraged to copy this to staff and to place it on staff notice boards.

4.3 Reporting of all frauds and irregularities is essential to ensure:

- consistent treatment of information;



- proper investigation by an independent and experienced team;
- the optimum protection of the AC's interests.

## **5. FRAUD AND CORRUPTION**

5.1 Any actual or suspected instance must be reported to a Board Director immediately. Staff must discuss their suspicions or what they have discovered with one of the following:

- Company Secretary
- Chairman of the Board
- Company Treasurer

Or a member of the Board (but only in cases involving the Company Secretary, Chairman of the Board or Company Treasurer)

5.2 These Directors will treat inquiries confidentially and anonymously if so requested. Where staff feel unable to inform any of the above, the Sport Wales Governing Body Liaison Officer can also be notified of any genuine suspicions of fraud or corruption within AC.

## **6. THEFT**

6.1 This must be reported to a Board Director. An incident form must be completed.

## **7. OTHER IRREGULARITY** e.g. viewing offensive Internet pages.

7.1 Any actual or suspected instances including viewing or viewing of particularly offensive or inappropriate Internet material must be reported immediately..

## **8. OTHER MEANS OF REPORTING**

8.1. If an employee suspects their manager, the employee should report the suspicions to someone more senior. If the suspicion involves the Chairman of the Board, the matter must be reported to the Sport Wales Governing Body Liaison Officer who may consider that an external investigation is necessary.

## **9. TIMELINESS**

9.1 It is essential that all staff act at the time of their concerns, as time is likely to be of the utmost importance to prevent further loss to AC. However, staff must not confront any individual that they suspect. Nor must staff contact the police directly; they must contact one of the persons listed in paragraph 5.1 in the first place. Staff should keep or copy any document that arouses their suspicions.

## **10. DISCIPLINARY ACTION**

10.1 The disciplinary procedures of AC will be followed where an employee is suspected of being involved in a fraudulent or illegal act. This may include dismissal. See AC's Disciplinary Procedure for further information.

## **11. CONFLICT OF INTEREST**

11.1 Members, Officers and Volunteers

Board Members and volunteers are subject to the same high standards of accountability as employees, and are required to declare and register any interests that might potentially conflict with those of AC. If any member, officer or volunteer of AC has a financial, commercial, personal or other interest, either direct or indirect, in any contract, proposed



contract or other matter, and is present at any meeting at which that contract or other matter is the subject of consideration, he or she is required, as soon as practicable after the meeting's commencement, to disclose the fact, and shall be prohibited from taking part in the consideration or discussion of the contract or other matter or to vote on any question with respect to it.

Interests such as the following shall be disclosed, although the list is not exhaustive:

any employment or income received from work undertaken within angling

any income received from angling as a partner, director or employee within a firm;

any sponsorship personally received;

any sponsorship given to any aspect of angling;

any contracts with angling for the provision of services or goods for profit;

any interests in any corporate bodies which do business with AC.

Any interest which any close members of the family of the member, officer or volunteer may have in these matters shall also be declared when matters or issues are discussed which could affect their financial position

For the record, and for openness and scrutiny, a Register of Interests shall be maintained, in which the interests of those persons referred to in this section shall be declared in writing. Written disclosures shall be entered in the Register, which shall be maintained by the Company Secretary.



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